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*Counsel for Plaintiffs*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

MDL No. 3084 CRB

Honorable Charles R. Breyer

This Document Relates to:

*R.L. vs. Uber Technologies, Inc., et al.,  
3:25-cv-05515;*

*P.T. vs. Uber Technologies, Inc., et al.,  
3:25-cv-05677;*

*S.W. vs. Uber Technologies, Inc., et al.,  
3:25-cv-06329; and*

*J.H. vs. Uber Technologies, Inc., et al.,  
3:25-cv-05342.*

**PLAINTIFFS' RESPONSE TO  
DEFENDANTS' THIRD SHOW CAUSE  
MOTION SEEKING DISMISSAL OF  
ADDITIONAL NON-BONA FIDE  
RECEIPTS AND LIMITED DEPOSITIONS**

The Court should deny Defendants' third show cause motion [ECF 4137] and permit Pulaski Kherkher, PLLC to withdraw as counsel of record for Plaintiff's P.T. and S.W. pursuant to Local Rule 11-5 [ECF 4226]. The Court should further deny Defendant's show cause motion with respect to Plaintiff R.L. who recently produced a *bona fide* ride receipt via MDL Centrality [see *id.*]. Lastly, the Court should deny Defendants' request to depose Plaintiff J.H. as an impermissible fishing expedition lacking any relevance to J.H.'s claims against Defendants. A

1 limited deposition at this point would be unduly burdensome to J.H. and likely duplicative in  
2 the event her case is selected for further discovery.

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4 Dated: October 27, 2025

Respectfully submitted,

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6 **PULASKI KHERKHER, PLLC**

7 /s/ D. Douglas Grubbs

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Counsel for Plaintiffs

**CERTIFICATE OF SERVICE**

I hereby certify that on October 27, 2025, I electronically transmitted the foregoing PLAINTIFF'S RESPONSE TO DEFENDANTS' THIRD SHOW CAUSE MOTION SEEKING DISMISSAL OF ADDITIONAL NON-BONA FIDE RECEIPTS AND LIMITED DEPOSITIONS to the Clerk's office using the CM/ECF system for filing thereby transmitting a Notice of Electronic Filing to all CM/ECF registrants. Additionally, the foregoing was served on Defendants' counsel via email at: [ubermdlservice@listserv.shb.com](mailto:ubermdlservice@listserv.shb.com).

/s/ D. Douglas Grubbs  
D. Douglas Grubbs